

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X Index No.: 08 Cv. 5461

MARIN DUMITRESCU,

Plaintiff,

PLAINTIFF DEMANDS
A TRIAL BY JURY

-Against-

GENERAL MARITIME MANAGEMENT,
INC., and GENERAL MARITIME
CORPORATION,

SEAMAN'S CASE UNDER
THE JONES ACT FOR
PERSONAL INJURIES

Defendants.

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**SUITS UNDER SPECIAL RULE FOR SEAMEN TO SUE WITHOUT
SECURITY OR PREPAYMENT OF FEES FOR THE ENFORCEMENT OF THE
LAWS OF THE UNITED STATES, COMMON AND STATUTORY, FOR THE
PROTECTION OF AND FOR THE HEALTH AND SAFETY OF SEAMEN AT
SEA**

Plaintiff, complaining of the defendants, by his attorneys, WERTHEIMER
ASSOCIATES, P.C., respectfully alleges:

FIRST COUNT

FIRST: Upon information and belief, at all times hereinafter mentioned,
the defendant GENERAL MARITIME MANAGEMENT, LLC, was a foreign limited
liability company doing business in the State of New York.

SECOND: Upon information and belief, at all times hereinafter mentioned,
the defendant GENERAL MARITIME CORPORATION, was a foreign corporation
doing business in the State of New York

THIRD: Upon information and belief, the defendant GENERAL MARITIME MANAGEMENT, LLC and/or GENERAL MARITIME CORPORATION owned the vessel GMR Conqueror.

FOURTH: Upon information and belief, the defendant GENERAL MARITIME MANAGEMENT, LLC and/or GENERAL MARITIME CORPORATION, operated the vessel GMR Conqueror.

FIFTH: Upon information and belief at all times and dates hereinafter mentioned, the defendant GENERAL MARITIME MANAGEMENT, LLC and/or GENERAL MARITIME CORPORATION controlled the vessel GMR Conqueror.

SIXTH: At all times hereinafter mentioned, the plaintiff was employed as a fitter on the vessel GMR Conqueror.

SEVENTH: That on or about the 11th day of July, 2005, without any fault on the part of the plaintiff, and wholly and solely by reason of the negligence, recklessness and carelessness of the defendants, its agents, servants and/or employees, and by reason of the unseaworthiness of its/their vessel, the plaintiff was caused to sustain injuries.

EIGHTH: As a result of the foregoing, the plaintiff was rendered sick, sore, lame, and disabled, sustained severe permanent personal injuries, is internally and externally disabled, caused to suffer pain, and prevented from attending to his daily labors, thereby losing sums of money which he otherwise would have earned as wages; and has endeavored to be cured of his injuries, and has expended sums of money to maintain himself, and will continue to endure pain and suffering, all to his damage.

NINETH: By reason of the foregoing, plaintiff has been damaged in the sum of FIVE MILLION DOLLARS (\$5,000,000.00).

SECOND COUNT

TENTH: Plaintiff repeats and realleges each and every allegation of the FIRST COUNT in this Complaint, as if fully set forth at length herein.

ELEVENTH: Plaintiff is entitled to maintenance, cure and medical expenses for the period that he was disabled and unable to work in the total sum of FIVE HUNDRED THOUSAND DOLLARS (\$500,000.00).

WHEREFORE, plaintiff demands judgment against defendant in the FIRST COUNT in the sum of FIVE MILLION (\$5,000,000.00) DOLLARS, and in the SECOND COUNT in the sum of FIVE HUNDRED THOUSAND (\$500,000.00) DOLLARS, together with the costs of this action.

Dated: New York, New York
June 16, 2008

WERTHEIMER ASSOCIATES, P.C.

By: _____
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